



THE TRUMPETER SWAN SOCIETY

12615 County Road 9, Plymouth, MN 55441 • 763/694-7851 • FAX 763/557-4943

WASHINGTON SWAN STEWARDS

PMB 272, 914- 164th Street SE, Mill Creek, WA 98012 • 425-787-0258

1 October 2012

Mr. Brad Feilberg
City of Monroe, Public Works Director
806 West Main St.
Monroe, WA 98272

We have reviewed the permits submitted by H3O to build a wake board facility at Lake Tye. In response to citizen comments, including those of TTSS, a SEPA Checklist and Critical Areas Report Supplement was prepared by the applicants consultant, Parametrix. After reviewing this document, it is clear that the consultants selectively chose some references and ignored two of the most important ones regarding information on trumpeter swans. As a result, there are egregious errors in biological information, impacts to wildlife, and status of these birds including the use of Lake Tye by other birds. When misleading or egregiously inaccurate information is provided to decision makers on a project, the result is one that does not serve the public or our wildlife resources well.

The information on swans provided in the supplemental document has many egregious errors and omissions of important information. We have commented on several aspects of this document and made direct responses to contents in the document (red) with our response directly below them. We believe that making a sound decision about this projects impacts to migratory birds based on facts is not possible with the information provided by the documents submitted by the applicant.

The most significant issue stems from their lack of understanding that the Trumpeter Swans that use western Washington. The swans of Washington, as all waterfowl here, are designated by the US Fish and Wildlife Service (USFWS) to be in the Pacific Flyway (2006). The Trumpeter swans are split into two population groups, the Pacific Coast Population (PCP) and the Rocky Mountain Population (RMP). The Trumpeter Swans in western Washington are part of the Pacific Coast Population (PCP). They breed in Alaska and winter along the coastal and inland areas west of the Cascade Mountains as far south as the Willamette Valley in Oregon. The Rocky Mountain Population (RMP) occurs east of the Cascade Mountains in Washington. These two groups have distinct and separate breeding, migration and wintering areas. The US Fish and Wildlife Service (USFWS) has separate management plans for each population (USFWS 2006 and 2008). None of these documents were used by Parametrix during their environmental review.

The second serious error is the omission of information on the status, habitat needs and management concerns for Trumpeter Swans in western Washington, including the Snohomish Valley. The PCP Plan From the Pacific Flyway Implementation Plan for the Pacific Population of Trumpeter Swans states the following for Washington State, especially for western Washington:

1. Protection of Swans and Habitats. - - The following measures are recommended to improve protection to swans and their habitats:

- a. Initiate conservation actions necessary to secure and/or develop critical feeding sites and night roost areas. (WDFW; Priority 1; As practical)
- b. Maintain integrity of available swan habitats through environmental review of proposals for development (WDFW, USFWS; Priority 1; Ongoing)
- c. Eliminate or minimize human disturbance factors by regulations and education (WDFW; TTSS; Priority 2; As appropriate)

2. Monitoring and Investigations. - - The following monitoring and investigative efforts are recommended:

- a. Document habitat requirements and shifts in habitat use of wintering TRUS (WDFW; Priority 1; Ongoing)

Another significant omission is the fact that WDFW in its Comprehensive Wildlife Conservation Strategy document lists the Trumpeter Swan as a Species of Greatest Conservation Need (SGCN). Thus, greater consideration by those making decisions that affect the birds or their habitats needs to be taken. Also of note is that the western grebe which uses Lake Tye is also listed as SGCN.

This is important information because this proposed project is to be built adjacent to agricultural lands that are highly attractive to waterfowl. In fact, the 2,000 acres directly west of the lake are a series of private hunting clubs that plant crops specifically to attract large numbers of ducks and geese. To the south of Lake Tye are dairy farms and another several thousand acres planted to a variety of crops that also attract waterfowl. Dairy farms are especially attractive for Trumpeter Swans and they are just south of Lake Tye as the birds fly.

This proposed project is unique in that, to the best of my knowledge, no cable wake board parks anywhere have been built adjacent to or within a major migratory waterfowl corridor or major winter use area. Thus, it is vital that the use of Lake Tye by migratory birds be better understood before we build impediments that may be detrimental to a much larger body of wildlife using the area.

Lake Tye itself is actually a staging area for fall migratory waterfowl. The Supplemental document statement that: **Since Lake Tye is primarily a storm water facility and public park, its status as a waterfowl area is clearly incidental.**

Response: Little information has been collected that is in the public domain, however, anyone going out to observe this area during the fall migration will likely see what I did today, October 1, 2012. I was driving out in the area and observed a flock of Canada geese flying east toward Monroe. I followed and observed them landing on the lake. These geese were not residents but birds migrating down from their northern breeding grounds. Observations are listed in a table at the end of this letter. It is of note that there were three types of geese at Lake Tye today in addition to other waterbirds.

Additional corrections to information from the Supplemental document are provided below. We have not addressed all the errors that were found.

The Trumpeter Swan is the largest of North American waterfowl. It was reduced to near extinction by the early 20th century, but it is relatively common today. In Washington State it winters in protected marine waters of northern Puget Sound and adjacent agricultural lands.

Response: Typically they use agricultural fields and dairy farms that are adjacent to fresh water wetlands. These wetlands are used for night roosting. Trumpeter swans may use estuarine river mouth areas, but primarily the

estuarine areas are used by tundra swans for roosting. It is the combination of fresh water wetlands adjacent to agricultural areas, especially dairy farms, that make an area important for swan use.

Up to 3,000 birds, a large segment of the Alaska breeding population winters around northern Puget Sound, Hood Canal, and southwestern Washington river valleys (WDFW 2005). The Washington Swan Stewards list and map Skagit River concentrations in the delta area with a narrow extension up the Skagit River to the vicinity of Clear lake (WSS 2012). Similar maps are not available for the Snohomish River, but a similar pattern exists of major concentration near the shores of Puget Sound in Port Susan Bay. Lake Tye is not a major concentration area.

Response: The information provided confuses the PCP with the RMP Trumpeter Swans in Washington. Parametrix has confused information related to these very distinct group of swans in terms of geographic distribution and migration, breeding and wintering areas. PCP trumpeters breed in Alaska and winter along the western side of the Cascade Mountains in Washington, migrating as far south as the Willamette Valley in OR. The RMP breeds in Canada and parts of the intermountain west, migrates south as far as Utah and northern California, including Nevada. There is little interaction between these two populations and they have different population numbers and management issues.

In western Washington we have the largest concentration of wintering Trumpeter Swan in North America. The Skagit Valley to the north and Snohomish County in the area of Lake Tye are number 1 and 2 in wintering numbers. Comprehensive, state wide swan surveys are done every 5 years in January following the 5 year Alaska breeding swan survey. In addition, TTSS and WDFW conduct winter swan surveys each year in local areas. The Snohomish County zone between Everett and south into the Snoqualmie Valley is one of these emphasis areas. Population surveys in January 2012 for these areas:

	Trumpeters	Tundra	Total swans
Whatcom/Skagit counties:	6,187	1,157	7,344
Snohomish County(southern)	1,034	12	1,046

Typically the highest number of swans occurs during migration in early to mid-December when up to 2,000 swans, both Trumpeter and Tundra, move through the Snohomish-Snoqualmie valley area. The highest count for swan use near Lake Tye was in January 2011 when at least 800 swans were using the adjacent fields and wetlands west of Lake Tye and flying around Lord's Hill to the east into the dairy farms just south of Monroe. In addition, more than 200,000 ducks and thousands of geese (Canada goose, white-fronted goose, and snow goose) use this same area during the winter months. This area of Snohomish and King counties is a significant use area providing important winter feeding areas adjacent to quality fresh water wetland night roost areas.

The avian collision issue is of serious concern but does not appear to be adequately understood by Parametrix given their response in the Supplemental document. The cable towers that are guyed are built over the lake surface and are not comparable with communication towers that are built on land. Even if such a comparison could be made, they failed to provide information on the local communication towers built along Short School Road across the river from the Bob Heirman Wildlife Park. These towers were mandated to provide mitigation by building non-guyed towers with special lighting to protect migratory birds, especially waterfowl, from collisions. The fact is that if this project is built, it will create an oval of towers, cable wires and support guy wires directly over the lake in an area of known waterfowl concentrations.

Mr. Brad Smith of H3O contacted me (pers. com. 9/28 and 10/1 2012) regarding potential avian collision mitigation. We are willing to work with H3O to have adequate line marking that would provide collision protection for the waterfowl and other water birds that come to the lake. This includes marking the guy wires year round and the cable lines during the seasonal closure of their facility, likely about October 1 through the end of April. This mitigation needs to be a condition of the permit.

Our original comments still stand: We recommend that you require mitigation in the form of cable and guy wire marking as recommended above as a condition of the permits issues for this project. The applicant has indicated a strong willingness to do this. Making it a condition for mitigation is the best protection for this important migratory waterfowl area. In addition, it is possible to have waterfowl and water bird surveys at Lake Tye this fall to better understand the use of the lake for migrating birds. This would better answer the question about Lake Tye's role as a wetland in the greater Snohomish-Snoqualmie area and its importance to water birds in the area.

If you need additional information or have questions about our concerns please contact me at the above listed numbers or e-mail at martha@trumpeterswansociety.org.

Sincerely,



Martha Jordan
Wildlife Biologist
Chair, Washington Swan Stewards

Observations at Lake Tye, October 1, 2012 by Martha Jordan

Canada geese – larger size	87
Cackler Canada goose -	85
White-fronted goose	18
Western Grebe	3 (listed by WDFW as a Species of Greatest Conservation Concern)
Horned grebe	3

References

USFWS. 2006. Pacific Flyway Implementation Plan for the Pacific Population of Trumpeter Swans
pacificflyway.gov/Documents/Pcts_plan.pdf

USFWS. 2008. Pacific Flyway Implementation Plan for the Rocky Mountain Population of Trumpeter Swans
pacificflyway.gov/Documents/Rmts_plan.pdf

WDFW (Washington Department of Fish and Wildlife). 2005. Comprehensive Wildlife Conservation Strategy (CWCS) Chapter IV: Species of Greatest Conservation Need. Olympia WA September 19, 2005
http://wdfw.wa.gov/publications/00727/chapter_iv.pdf